

# **EXHIBIT C**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION**

DEBBIE PLUCKER,

Plaintiff,

vs.

UNITED FIRE & CASUALTY COMPANY,

Defendant.

Civ. 12-4075

**CERTIFICATION**

TO: PLAINTIFF DEBBIE PLUCKER AND HER ATTORNEYS OF RECORD, ROBERT TRZYNSKA AND MICHAEL BORNITZ:

United Fire and Casualty Company provides the following Certification in response to Order [Doc. 29].

**Interrogatory No. 5.**

United Fire has identified Sherry Wade, Roberta Sniffen, Kristine Schares and Dave Conner. United Fire is knowledgeable of its organizational chart and the employees who handled, reviewed, supervised and/or audited Debbie Plucker's claim, including persons in the chain of command above these individuals up to the head of the claims department. United Fire hereby certifies that no other individuals responsive to Interrogatory No. 5 exist.

**Request for Production 7.**

United Fire produced the personnel files of Roberta Sniffen (UF 1834 – 1864); Sherri Wade (UF 1865 – 1905); Dave Conner (UF 2721 – 2762) and Kristine Schares (UF 2763 - 2803). United Fire certifies that these are the complete personnel files of the referenced individuals.

**Request for Production 10.**

United Fire produced its Goals and Objectives, Claim Manual and Branch Manual. United Fire certifies that, based on a review of its records and documents, that no documents exist related to cost containment programs or efforts to lower costs with respect to handling of automobile claims from January 1, 2007 to present.

**Request for Production 11.**

United Fire produced its Goals and Objectives, Claim Manual and Branch Manual. United Fire certifies that, based on a review of its records and documents, that no documents exist related to efforts to increase profitability with respect to handling of automobile claims from January 1, 2007 to present.

**Request for Production 12.**

United Fire produced its Goals and Objectives, Claim Manual and Branch Manual. United Fire certifies that, based on a review of its records and documents, that no documents exist related to efforts to reduce loss ratios or claim severity costs since January 1, 2007 to present.

**Request for Production 13.**

United Fire produced its Annual Incentive Plans (AIP) Plan Documents 2001 – Present and United Fire Group Employee Bonus Plan target and goal spreadsheet documents for the years 2003-2012. United Fire certifies that no other documents exist referencing or related to bonus or award programs for United Fire's employees who handled, reviewed, supervised, and/or audited Plaintiff's claim, including persons in the chain of command above these individuals up to the head of the claims department from January 1, 2007 to present.

**Request for Production 15.**

United Fire produced its Annual Incentive Plans (AIP) Plan Documents 2001 – Present, United Fire Group Employee Bonus Plan target and goal spreadsheet documents for the years 2003-2012 and United Fire's Claims, Branch and Employee Manuals. United Fire certifies that no other documents exist referencing or related to increases in salary, bonuses, commissions or awards for personnel handling automobile claims, including supervisory personnel up to the head of the claims department from January 1, 2007 to present.

**Request for Production 16.**

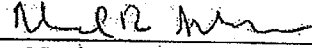
United Fire certifies that no documents exist referencing or related to performance-based incentive plans used by or communicated to personnel handling automobile claims, including supervisory personnel up to the head of the claims department from January 1, 2007 to present.

**Request for Production 22.**

The parties agreed that RFPD No. 22 is limited to Sherri Wade, Roberta Sniffen, Kristine Schares and Dave Conner. United Fire certifies that these employees have not given deposition or trial testimony in any suit alleging breach of contract, fraud, or bad faith in a case arising out of first-party automobile claims from January 1, 2007 to present.

DATED this 27<sup>th</sup> day of February, 2014.

UNITED FIRE & CASUALTY COMPANY

By:   
Neal R. Scharmer

STATE OF Iowa )  
 ) :ss  
COUNTY OF Linn )

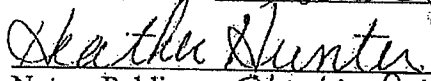
Neal R. Scharmer, on behalf of Defendant United Fire & Casualty Company, being first duly sworn on oath, deposes and says that he has read the foregoing Certification and knows the contents thereof and that the same is true of his own knowledge.

Dated this 27<sup>th</sup> day of February, 2014.

UNITED FIRE & CASUALTY COMPANY

By:   
Neal R. Scharmer

Subscribed and sworn to before me  
this 27<sup>th</sup> day of February, 2014.

  
Notary Public - State of Iowa  
My comm. expires: 7/2019

Notarial Seal  
State of Iowa  
Heather Hunter  
Commission Number 762049  
My Commission Expires 3/5/2016

(SEAL)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Certification** was served via U.S. Mail, postage prepaid, upon Michael D. Bornitz and Robert D. Trzynka, Cutler & Donahoe, LLP, 100 N. Phillips Avenue, P.O. Box 1400, Sioux Falls, SD 57101-1400, attorneys for Plaintiff, this 27 day of February, 2014.

By   
Eric D. DeNure